

REQUEST FOR TARIFF QUOTA
Member State : TURKEY
Part I

1. Combined Nomenclature codes:

3901 10 90

2. Precise product description taking into account customs tariff criteria:

Low density polyethylene

For chemical product only (mainly chapter 28 + 29 of Combined Nomenclature):

Not applicable

3. i) CUS No (Reference number in European Customs Inventory of Chemicals):

0141106-9

ii) CAS No (Chemical Abstracts Service Registry Number):

9002-88-4

iii) Other No: Not applicable

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Part II

4. Further information including commercial denomination, mode of operation, intended use of the imported product, type of product in which it is to be incorporated and end-use of that product:

Commercial denomination

Low density polyethylene, having a specific gravity of less than 0.94, commonly known by its abbreviation LDPE

Mode of operation

LDPE is a polymerized ethylene resin, used especially for containers, kitchenware, and tubing, or in the form of films and sheets for packaging. It is also a component in plastic bottles. General literature regarding LDPE is attached as Annex 1.

Manufacturing process

LDPE is derived from either modifying natural gas (a methane, ethane, propane mix) or from the catalytic cracking of crude oil into gasoline. In a highly purified form, it is piped directly from the refinery to a separate polymerization plant. Here, under the right conditions of temperature, pressure and catalysis, the double bond of the ethylene monomer opens up and many monomers link up to form long chains. LDPE is the result of "low pressure" operations.

Product characteristics

LDPE is a chemically resistant plastic that can be very durable. LDPE plastic comes in a low density form. LDPE is capable of being moulded, extruded and cast into many various shapes. It is often used in construction as it is cheap and can be shaped or moulded easily, this is why it is appropriated to be used for jobs such as guttering. LDPE is a hard, stiff, strong and a dimensionally stable material that absorbs very little water. It has good gas barrier properties and good chemical resistance against acids, greases and oils. It can be highly transparent and colourless but thicker sections are usually opaque and off-white. LDPE also has good self-extinguishing properties

and resistance against ultra violet. Technical data sheets regarding the most common grades of LDPE are attached as Annex 2.

Intended use of the imported product

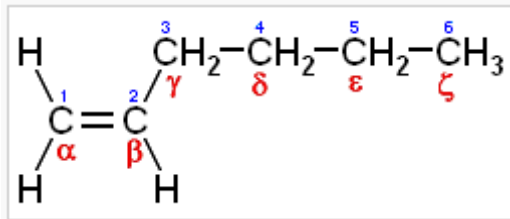
All industrial application, including packaging, construction, automotive, electrics and electronics materials.

Type of product in which it is to be incorporated and end-use

A great range of products, including heavy duty bags , greenhouse cover, film for packing, cable coating, kitchen utensils, toys, pipes, hoses, tubes, bottles, textile and metal coatings, rotating moulds, blow moulds, etc.

For chemical products only:

5. Structural formula:



6. Products are subject to a patent:

No

7. Products are subject to an anti-dumping/anti-subsidy measure:

No

8. Name and addresses of firms known in Turkey and the EU approached with a view to the supply of identical, equivalent or substitute products (obligatory for quota requests):

Sole Turkish producer:

- PETKİM Petrochemicals Company
P.O. Box 12,
35800 Aliğa-İzmir
Turkey
Tel : +90 232 – 6161240
Fax : +90 – 232 – 616 12 48

EU producers (source: Polyglobe):

- ExxonMobil Chemical
BE, Meerhout
BE, Zwijndrecht
- Sabic Europe
NL, Geleen
GB, Wilton (Teesside)
- Total Petrochemicals
BE, Feluy
FR, Carling
- Borealis
AT, Schwechat
SE, Stenungsund
FI, Porvoo
- Ineos
DE, Worringen
- Basell
PL, Plock
DE, Wesseling



- Compagnie Pétrochimique de Berre
FR, Aubette (Berre)
- Dow
NL, Terneuzen
ES, Tarragona
DE, Schkopau
- Polimeri Europa France Snc
FR, Dunkirk
DE, Oberhausen
- VersalisSrl
IT, Brindisi
- MOL Petrochemicals
HU, Tiszaujvaros
- Slovnaft Petrochemicals
SK, Bratislava
- TDESA
ES, Tarragona
- Repsol Chemicals
ES, Tarragona
PT, Sines
- Speciality Polymers
BE, Antwerp
- Dina Petrokemjia
HR, Krk
- Lukoil Neftochim
BG, Burgas

- Petrochemical Arges
RO, Pitesti
- Rompetrol Petrochemicals
RO, Navodari
- Poli-Chem
PL, Blachownia

Dates and results of these approaches:

As detailed below, the sole Turkish producer of LDPE - see attached as Annex 3, a PETKİM presentation showing its production capacity - can only satisfy 60 percent of total domestic demand. The remaining 40 percent of domestic demand must thus be satisfied by imports and Turkish converters have thus had to rely on imports. As evidenced by the import statistics regarding the last three years, imports from preferential partners cannot satisfy total demand in Turkey and 130 KT has to be imported from non-preferential trading partners.

Since the domestic industry only produced 320 KT in 2015, converters requested offers from EU producers. While these were unable to meet the great majority of requests for LDPE, they have, in recent years, been very careful not to submit any information that could be used to justify a tariff waiver. While unable to satisfy domestic demand, Turkish and EU producers of LDPE have generally obstructed requests for tariff waivers in recent rounds. It is submitted that the onus of demonstrating the absent of sufficient domestic/production should not only be placed on industrial users. Any objecting Turkish or EU producer should evidence that it can satisfy all requests - and the existing production deficit - and such evidence should be made available to concerned industrial users.

Reasons for the unsuitability of the products of these firms for the purpose in question:

Not applicable.

9. Calculation of tariff quota volume:

Annual consumption of applicant: 531 KT

In KT	2,013	2,014	2,015	2016 (anticipated)
Total Turkish Consumption	517	513	531	542

Source: ICIS

Estimated EU consumption in 2015: 4,340

Annual Turkish/EU production/capacity in 2015: 355 / 5,495 KT.

In KT	2013	2014	2015	2016 (anticipated)
Total Turkish Production	278	286	320	322
Total EU Production	4,390	4,594	4,627	4,663
Total Turkish Production Capacity	355	355	355	355
Total EU Production Capacity	5,565	5,495	5,495	5,455

Source: ICIS

Requested tariff quota volume: 134 KT - The requested quota volume corresponds to the balance between domestic consumption and exports on the one hand and domestic production and preferential imports on the other hand.

10. Special remarks:

- i) indication of similar tariff suspensions or quotas: Not applicable
- ii) indication of existing binding tariff information: Not applicable
- iii) other remarks: Not applicable

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Part III

11. Request submitted by:

T.C. Ekonomi Bakanlığı,
İthalat Genel Müdürlüğü
İnönü Bulvarı No:36,
06510 Emek
Ankara
Turkey
Tel: +90 312 204 75 00
E-mail: askiyaalma@ekonomi.gov.tr

12. Anticipated annual imports for 2017 (first year of the validity period requested):

- Value (in EUR): 477 M€
- Quantity (in weight and supplementary unit if applicable for the CN code in question): 280 KT

13. Current imports for 2014 and 2015:

- Value (in EUR): 396 M€ for 2014 and 479 M€ for 2015
- Quantity (in weight and supplementary unit if applicable for the CN code in question): 274 KT in 2014 and 281 KT in 2015.

14. Applicable duty rate at the time of the request (including preferential agreements, free trade agreements, if they exist for the origin of the requested goods):

Third country duty rate: 6.5 %

Preferential duty rate applicable: 0%

(EU, Israel, Croatia, Macedonia, Tunisia, Morocco, Palestine, Albania, Egypt, Kosovo, Georgia, Chile, Jordan, Mauritius, Montenegro, Serbia, EFTA countries, Bosnia Herzegovina, GSP beneficiaries, least-developed countries, Korea)

15. Estimated uncollected customs duties (in EUR) on an annual basis: 15 M€.



16. ..

17. Names and addresses of the user in the EU:

Name: Turkish Plastics Industry Foundation (PAGEV), on behalf of Turkish plastic converters.

Address: Halkalı Cad. No: 132/1 Tez-İş İş Merkezi Kat:4, Sefaköy / İstanbul - Turkey

Tel./Fax: 90 (212) 425 13 13 - 14 – 15 and +90 (212) 624 49 26

E-mail: pagev@pagev.org.tr

18. Declaration by the interested party that the imported products are not the subject of an exclusive trading agreement (join extra sheet – see Annex II to this communication) (obligatory)

The declaration is given as ANNEX -V.

ANNEX-I: General literature

ANNEX-II: Technical Data Sheets

ANNEX-III: A presentation of Petkim

ANNEX-IV: Turkish Customs Tariff of Polyethylene

ANNEX-V: Declaration by the interested party that the imported products are not the subject of an exclusive trading agreement